

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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ANGELA STUDDARD, individually and as	)	
lawful wife, next of kin, administrator ad	)	
litem, and personal representative for	)	
EDMOND STUDDARD, Deceased, and	)	
Estate of Edmond Studdard,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	2:17-cv-02517
ERIN J. SHEPHERD,	)	
and TERRY I. REED,	)	
	)	
	)	
Defendants.	)	

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**JOINT MOTION AND MEMORANDUM IN SUPPORT  
FOR CONTINUANCE OF TRIAL DATE**

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Plaintiff Angela Studdard (“Plaintiff”) and Defendants Erin Shepherd and Terry Reed (“Defendants”) jointly move the Court to continue the trial date in this cause, pending the approval by the Shelby County Commission of a settlement that would resolve all claims in this case. In support of their Motion, the parties state as follows:

This case is currently set for a jury trial beginning on March 16, 2020. Each party has at least one out-of-state expert witness whose attendance will be required, and each party anticipates the need to subpoena multiple non-party witnesses to testify.

Although the parties are prepared to go to trial, they have reached a potential settlement that would dispose of all claims and alleviate the need for trial. However, the settlement is contingent on ratification by the Shelby County Commission—a public body. (*See* ECF 214). The

parties are hopeful that the Commission will be able to review and will ratify the contingent settlement agreement before the trial date in this cause, and in enough time to notify the Court of a final settlement before that date. However, to avoid the unnecessary expense of bringing in out-of-state witnesses and subpoenaing others, and/or in the event that the Commission is not able to finalize the ratification before trial, the parties request that the Court strike the current trial date in this cause and reschedule the trial date by separate order. In the interests of both parties and judicial economy, the parties request that the Court continue the trial date.

Respectfully submitted,

/s/Daniel A. Seward (w/permission)

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*Attorneys for Defendants*

Certificate of Service

I certify that the foregoing is being filed via the Court's ECF system this 4<sup>th</sup> day of March, 2020, for service on all persons registered in connection with this case including:

Daniel A. Seward, Esq.  
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*Attorney for Plaintiff*

/s/E. Lee Whitwell